



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



**January 26, 2020**

**Federally-Enforceable District-Origin Operating Permit  
(FEDOOP)  
Statement of Basis**

**Source:** Anderson Finishing Solutions, Inc.  
3138 Del Park Terrace  
Louisville, KY 40211

**Owner:** Anderson Hardwood Pellets, LLC  
1381 Beech St.  
Louisville, KY 40211

Application Documents: See Table I-9      Administratively Complete: May 15, 2020  
Draft Permit: September 21, 2020  
Permitting Engineer: Aaron DeWitt      Permit Number: O-0322-20-F  
Plant ID: 0322      SIC: 2491      NAICS: 321114

**Introduction:**

This permit will be issued pursuant to District Regulation 2.17- Federally Enforceable District Origin Operating Permits. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

The purpose of this permit is the regularly scheduled permit renewal and Anderson Finishing Solutions, Inc. has applied to be exempt from STAR regulations.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), particulate matter less than 10 microns (PM<sub>10</sub>), and particulate matter less than 2.5 microns (PM<sub>2.5</sub>), and Sulfur Dioxide (SO<sub>2</sub>). Jefferson County is classified as a nonattainment area for ozone (O<sub>3</sub>).

**Permit Application Type:**

☐ Initial issuance      Permit Revision      ☒ Permit renewal  
☐ Administrative  
☐ Minor  
☐ Significant

**Compliance Summary:**

☐ Compliance certification signed      ☐ Compliance schedule included  
☐ Source is out of compliance      ☒ Source is operating in compliance

**I Source Information****1. Product Description:**

Anderson Finishing Solutions, Inc. is a wood furniture coating operation.

**2. Process Description:**

Anderson Finishing Solutions, Inc. coats wood furniture using six (6) spray booths.

**3. Site Determination:**

There are no other facilities that are contiguous or adjacent to this facility. On January 03, 2018, the company informed the District that the company had moved all equipment from 3000 Magazine Street facility to 3138 Del Park Terrace facility. All equipment covered by this permit is located at 3138 Del Park Terrace.

**4. Emission Unit Summary:**

<b>Emission Unit</b>	<b>Equipment Description</b>
U1/U2	Four (4) Racetrack spray booths with two (2) drying ovens One (1) Off-line paint spray booth One (1) 48" Roll coat UV cure line Two (2) spray coating UV lines with one (1) oven/heater

**5. Fugitive Sources:**

The source identified no fugitive sources of emissions.

**6. Permit Revisions:**

<b>Permit No.</b>	<b>Public Notice Date</b>	<b>Issue Date</b>	<b>Change Type</b>	<b>Description/Scope</b>
99-01-F	06/03/2001	11/01/2001	Initial	Initial Permit Issuance
O-0322-14-F	11/11/2014	12/22/2014	Renewal	Renewal
O-0322-14-F (R1)	01/24/2018	02/27/2018	Signif.	Ownership change and General Conditions update (GHG limit is removed from General Conditions)
O-0322-20-F	09/22/2020 12/23/2020	01/26/2020	Renew	Renewal and adding limit to become exempt from STAR

**7. Construction Permit History:**

Permit No.	Effective Date	Description
70-04-C	10/31/2005	Two (2) UV cured coating lines with overspray reclaim/filter system
27-06-C	03/31/2007	Gardina Finish Systems 48" UV cured roll coating line
37-06-C	03/31/2007	Gardina Finish Systems 48" waterborne UV spray coat line
114-08-C	02/26/2008	New Col-Met paint booth
699-08-C	12/31/2008	New Col-Met off-line dry filter paint booth. Modification of 48" UV cure roll coat line

**8. Application and Related Documents**

Document Number	Date	Description
119709	9/30/2019	Application & SDS, requesting STAR exempt
143857	11/1/2019	Admin corrections request from District
126016	12/9/2019	FEDOOP Renewal application
129682	12/20/2019	STAR exempt PTE calculations from company
143858	2/13/2020	Application questions from District
143828	5/15/2020	STAR exempt application and 9440-O
171549	9/4/2020	Email draft permit for company review
175859	10/23/2020	Company comments to FEDOOP draft permit
180029	12/9/2020	Email draft permit for company review
180884	12/23/2020	Email company review of draft permit

**9. Emission Summary**

<b>Pollutant (ton/yr)</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>VOC</b>	<b>Total HAP</b>	<b>Single HAP</b>
Actual Emissions (2018)	0.11	0.13	0.0008	0.062	30.7 <sup>1</sup>	0.44	0.28
Major source trigger (based on PTE)	No	No	No	Yes	Yes	Yes	Yes

**10. Applicable Requirements**

- ☐ 40 CFR 60                      ☒ SIP                                      ☐ 40 CFR 63  
☐ 40 CFR 61                      ☒ District Origin                      ☐ Other

**11. Referenced Federal Regulations:**

The source has no federal requirements.

**12. Non-Applicable Regulations:**

None

**II Regulatory Analysis****1. Stratospheric Ozone Protection Requirements:**

Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. Anderson Finishing Solutions, Inc. does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

**2. Basis of Regulation Applicability****a. Applicable Regulations**

<b>Regulation</b>	<b>Title</b>	<b>Basis</b>
2.17	Federally Enforceable District Origin Operating Permits	FEDOOP

<sup>1</sup> 2018 Emission Inventory was prior to Anderson Finishing Solutions, Inc. applying to be exempt from STAR regulations.

Regulation	Title	Basis
5.00	Definitions	Regulation 5.00 establishes emission limits for exempt “stationary sources” that would otherwise be subject to the STAR Program environmental acceptability goals.
7.08	Standards of Performance for New Process Operations	Establishes the requirements for PM emission from new processes that commences construction after September 1, 1976.
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	Establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District Regulation 7, and apply to new processes commenced after June 13, 1979

**b. Plantwide**

- i. Anderson Finishing Solutions, Inc. is potentially major for VOC, Single HAP and Total HAP. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements. The source requested limits of the PM<sub>10</sub> and VOC less than 100 tons per year, to be classified as a synthetic minor (FEDOOP) source.
- ii. Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establish requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. Anderson Finishing Solutions, Inc. has requested emission limits of less than 25 tons per year for all criteria pollutants, less than 12.5 tons/year for total HAPs and less than 5 tons per year for each individual HAP to be considered exempt from local TAC (STAR) regulations, as defined by Regulation 5.00, section 1.13.5.
- iii. Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

- iv. Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit regular reports to show compliance with the permit. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.1. The compliance reports are due within 60 days of the end of the reporting period:

<b><u>Reporting Period</u></b>	<b><u>Report Due Date</u></b>
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

**c. Emission Unit U1/U2 – Coating System**

<b>EP</b>	<b>Description</b>	<b>Applicable Regulations</b>
E-1	Racetrack Spray Booth 1, make Leader Fan Industries (LFI), model BTA 36T 30200M, capacity 9.4 gal/hr	7.08, 7.25
E-6	Racetrack Spray Booth 2, make Col-Met, model BAF-30, capacity 9.4 gal/hr	7.08, 7.25
E-2	Racetrack Spray Booth 3, make Binks, model 30-690, capacity 9.4 gal/hr	7.08, 7.25
E-3	Racetrack Spray Booth 4, make LFI, model BTA 36T 30750M, capacity 9.4 gal/hr	7.08, 7.25
E-4 A/B	Electric drying oven/heaters (2 radiant heaters/elements), make Superior Radiant Products LTD, model UA125, capacity 125,000 Btu/hr each (IA)	7.25
E-5	Off-line paint spray booth, make Col-met, model BAF-30, capacity 9.4 gal/hr	7.08, 7.25
E-7	48” Roll Coat UV Cure Line, make Gardina, model Dual Tech 401, capacity 6 gal/hr	7.08, 7.25
E-9	Spray coating UV line with oven, make Gardina, model Dual Tech Spray 401, capacity 12.5 gal/hr	7.08, 7.25
E-10	Spray coating UV line, make Superfici, model Twin Spray, capacity 12.5 gal/hr	7.08, 7.25
E-11	Oven/Heater, make Giardina, one (1) model Laminar Oven and one (1) Jet Air Oven, burner make Frostfighter, model IDF500 Indirect Gas heater (provides hot air to both oven), capacity 0.42 MMBtu/hr (IA)	7.25

**i. Standards**

**(1) HAP**

Regulation 2.17, section 5.1 allows the source to set a synthetic limit below the major source threshold.

(2) **Opacity**

Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

(3) **PM**

For equipment subject to Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2. Using the minimum spray gun transfer efficiency of 65%, the percent solids of the material 45.9%, and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booths cannot be exceeded.

(4) **VOC**

Regulation 7.25, section 2.1 and 3.1 establish emission standards for processes producing VOC emissions. VOC emissions plantwide shall be limited to less than 25 tons.

### III Other Requirements

1. **Temporary Sources:**

The source did not request to operate any temporary facilities.

2. **Short Term Activities:**

The source did not report any short term activities.

3. **Emissions Trading:**

The source is not subject to emission trading.

4. **Alternative Operating Scenarios:**

The source did not request any alternative operating scenarios.

5. **Compliance History:**

Date	Regulation Violated	Settlement
08/29/2000	Reg. 2.03, section 5	Incident #02262. Permit Conditions - Not in accordance with application. Agreement with fine \$1250
04/20/2012	Reg. 1.13, section 2	Incident #06269. Failure to control objectionable odors. Agreement

Date	Regulation Violated	Settlement
05/04/2012	Reg. 1.13, section 2	Incident #06285. Failure to control objectionable odors. Agreement with fine \$750
05/31/2012	Reg. 1.13, section 2	Incident #06294. Failure to control objectionable odors. Agreement with fine \$375
06/19/2012	Reg. 1.13, section 2	Incident #06307. Failure to control objectionable odors. Agreement with fine \$375

#### 6. Calculation Methodology or Other Approved Method:

The VOC emission calculations are based upon VOC content of the material used and the HAP emission calculations are based upon the throughput of HAP containing material used and weight percent of the HAP.

#### 7. Insignificant Activities

Equipment	Qty	PTE (ton/yr)	Regulation Basis
Electric Drying Oven/Heater, Superior Radiant Products LTD/UA125, capacity 0.125 MMBtu/hr each (EU U1/U2, EP E-4 A/B)	2	NO <sub>x</sub> 2.13 PTE total	Regulation 1.02, Appendix A section 1.1
Heater, Roberts Gordon Compact Radiant Heater, model BH-200, capacity 0.2 MMBtu/hr	1		Regulation 1.02, Appendix A section 1.1
Laminar and Jet Air Oven Burner, capacity 0.42 MMBtu/hr (EU U1/U2, EP E-11)	1		Regulation 1.02, Appendix A section 1.1
Room Heater, capacity 0.1 MMBtu/hr	1		Regulation 1.02, Appendix A section 1.1
Bonanza Air Makeup Unit, HVAC, capacity 2.2 MMBtu/hr	1		Regulation 1.02, Appendix A section 1.1
HVAC, Modine #1-#6, capacity 0.2 MMBtu/hr each	6	NO <sub>x</sub> 0.04 PTE	Regulation 1.02, Appendix A section 1.1
HVAC, Office heater, capacity 0.1 MMBtu/hr	1		Regulation 1.02, Appendix A section 1.1



1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4.
3. The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.
6. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) to be reported on the annual emission inventory.
7. The District has determined pursuant to Regulation 2.16, section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) Basis of Regulation Applicability for IA units